



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 6, 2008

MEMO ENDORSED

BY HAND

The Honorable Lisa Margaret Smith
United States Magistrate Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

**Re: Raymond Accolla v. United States,
08 Civ. 3223 (SCR)(LMS)**

Dear Judge Smith:

The Government respectfully requests an extension of time until August 11, 2008 to respond to petitioner's motion to vacate his sentence. Since this Court issued its original scheduling order, the Government has: (1) obtained the files concerning Accolla's criminal case; (2) contacted Accolla's original defense lawyer, Michael Keese, Esq., and obtained an affidavit from Mr. Keese responding to the allegations made against him by Accolla; and (3) contacted and forwarded a copy of Accolla's petition to Randy Steinhauser, Esq. – the attorney who represented Accolla at sentencing.

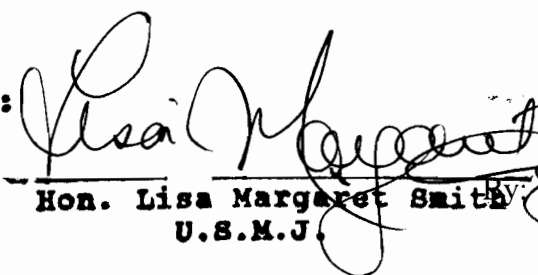
On or about June 4, 2008, I spoke with Mr. Steinhauser. During the conversation, Mr. Steinhauser informed me that he would be able to send me an affidavit responding to Mr. Accolla's allegation by July 4, 2008. Once the Government obtains Mr. Steinhauser's affidavit, it will then be in position to respond to the numerous allegations raised by Accolla in his petition and brief. As a result, the Government respectfully requests a two month extension of time – from June 10, 2008 to August 11, 2008 – to file its response to Accolla's petition.

Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney

John P. Collins, Jr.
Assistant United States Attorney
Telephone: (914) 993-1919

SO ORDERED:


Hon. Lisa Margaret Smith
U.S.M.J.

cc: Raymond Accolla, pro se (by U.S. Mail)